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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
RAHMAT ABDHIR et al )  
 )  
Defendants. )  
\_\_\_\_\_ )

No. CR-07-00501-JF (RS)

**MOTION ON CONSENT FOR  
PROTECTIVE ORDER  
RE: DISCOVERY MATERIALS**

SAN JOSE VENUE

Pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, the parties respectfully move the Court for the entry of a protective order governing the handling of discovery materials in this case. Counsel for the government and counsel for the defendant have conferred and consent to the entry of the proposed Order attached hereto, with the express understanding and request that the entry of such an Order be without prejudice to either party's right to request a revision of the Order by appropriate motion to the Court.

1 Accordingly, the parties respectfully request that the Court enter the attached Order on  
2 consent and without prejudice to either party's right to seek a revision of the Order by  
3 appropriate motion to the Court.

4 Respectfully submitted,

5 Dated: October 15, 2007

6 SCOTT N. SCHOOLS  
7 United States Attorney

RAHMAT ABDHIR  
Defendant

8  
9 /s/  
JONATHON SCHMIDT  
TRACIE BROWN  
10 Assistant U.S. Attorneys  
JOHN GIBBS  
11 JOANNA BALTES  
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/s/  
NICHOLAS HUMY  
CYNTHIA LIE  
Assistant Federal Public Defenders

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAHMAT ABDHIR,

a/k/a Sean Kasem,

a/k/a Sean Kalimin,

a/k/a Roy Kalimin,

a/k/a Salam A. Jabar, and

ZULKIFLI ABDHIR,

a/k/a Zulkifli Bin Abdul Hir,

a/k/a Hulagu,

a/k/a Holagu,

a/k/a Lagu,

a/k/a Marwan,

a/k/a Kulon

a/k/a Musa Abdul,

a/k/a Musa Abdul Hir,

a/k/a Zulkifli Abdul Hir,

a/k/a Zulkifli bin Hir,

a/k/a Abdul Hir bin Zulkifli,

a/k/a Abdulhir Bin Hir,

a/k/a Bin Abdul Hir Zulkifli,

Defendants.

No. 07CR 00501-01-JF

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED THAT:

I, Joanna P. Baltes, am a citizen of the United States and I am at least eighteen years of age. My business address is 950 Pennsylvania Avenue, N.W., Suite 2714, Washington, D.C. 20530.

I am not a party to the above-entitled action. I have caused service of the government's **MOTION ON CONSENT FOR PROTECTIVE ORDER RE: DISCOVERY MATERIALS** on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them:

Nicholas Humy. nicholas\_humy@fd.org

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 15, 2007.

/s/ Joanna P. Baltes  
JOANNA P. BALTES